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through partnership

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August 27, 2021

Via ECF

Hon. Louis L. Stanton
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: *Dresser-Rand Co. v. Petróleos de Venezuela, S.A., et al*, No. 19-cv-02689-LLS

Dear Judge Stanton:

This firm represents plaintiff Dresser-Rand Company (“D-R”) in the above-referenced action. We write, pursuant to Rule 1(A) of Your Honor’s Individual Practices, to withdraw D-R’s request of August 20, 2021, for a pre-trial conference in advance of the September 21–24 and September 27 trial dates. (*See* ECF No. 126.)

Following D-R’s request for a pre-trial conference, the parties conferred further, and Defendant Petróleos de Venezuela, S.A. (“PDVSA”) confirmed that it will no longer seek the trial testimony of either Denise Hansen, D-R’s general counsel, or Jose LaTorre, a former D-R sales manager. In light of this, D-R believes that a pre-trial conference is no longer necessary. We believe that any remaining issues, including the admissibility of the expert report and/or testimony of PDVSA’s proposed expert, John Barker, can be resolved at the commencement of trial.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Jordan W. Siev

Jordan W. Siev

cc: All Counsel of Record (*via ECF*)